Report of the Campus Safety Task Force Presented to Attorney General Roy Cooper

PREVENTION PREPAREDNESS RESPONSE RECOVERY
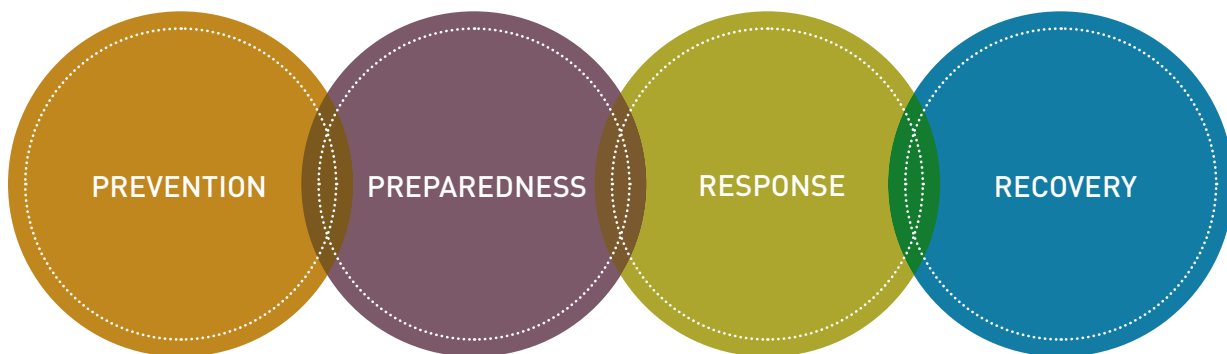
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ATTORNEY GENERAL ROY COOPER CAMPUS SAFETY TASK FORCE

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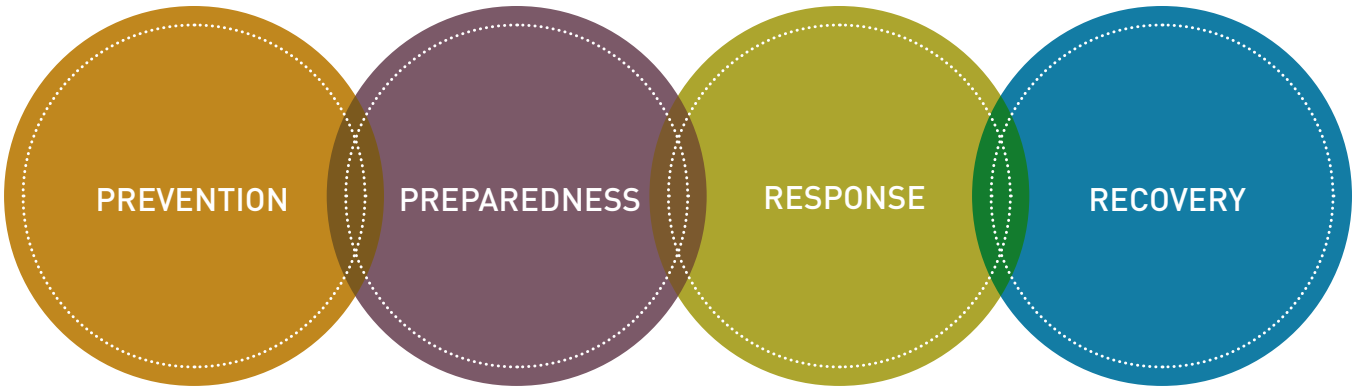Past President
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PREVENTION   PREPAREDNESS   RESPONSE   RECOVERY

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On the morning of April 16, 2007, Seung Hui Cho, a disturbed student, killed 32 students and faculty on the campus of Virginia Tech. It was the deadliest school shooting in American history. Two days after the Virginia Tech shooting, Attorney General Roy Cooper established the Campus Safety Task Force. "Our goal is to learn from this horrible event and to use those lessons learned to better protect our North Carolina campuses," said Attorney General Cooper. "We owe it to parents, students, faculty, and staff at our colleges and universities to be ready if a similar tragedy ever happens here."

Attorney General Cooper charged the 21-member Task Force with reviewing the state of campus security and recommending ways to better respond to a critical incident. Specifically, he asked the Task Force to consider the following: (1) prevention of a critical incident, including increasing campus safety awareness and assessing whether particular students are a risk; (2) preparedness for a critical incident, including better ways to use technology and to enhance coordination between schools and law enforcement; (3) response to a critical incident, including the importance of having multi-hazard plans and crisis communications in place; and (4) recovery from a critical incident, including how campuses can learn from past tragic events.

During the three meeting held in Raleigh, Charlotte, and Greensboro from June to September 2007, Task Force members heard from more than 30 experts, including educators, law enforcement officials, emergency management experts, victims' advocates, and psychologists. Notably, the Task Force members heard from Federal Bureau of Investigation Supervisory Senior Resident Agent Kevin Foust of Roanoke, Virginia, a first responder to the Virginia Tech shooting; and Ms. Stambaugh, Director of the Center for Public Protection for TriData, who served as Deputy Director of the Virginia Tech Review Panel. The Task Force also benefited from an extensive web-based survey conducted in late October and early November 2007 of 110 public universities, community colleges, and private institutions. Funding for the survey was made possible from the Governor's Crime Commission, the North Carolina Association of Campus Law Enforcement Administrators, and the North Carolina Department of Justice.

This report reviews and recommends ways in which State policymakers, campuses, and law enforcement offices can improve response to an incident like the one at Virginia Tech. Additionally, this report highlights the many significant steps our campuses have already taken to keep students and faculty safe. As Hollis Stambaugh, Deputy Director of the Virginia Tech Review Panel, told Task Force members, "North Carolina is already ahead of the game."

EXECUTIVE SUMMARY

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BACKGROUND

On the morning of April 16, 2007, Seung Hui Cho, a disturbed student, killed 32 students and faculty on the campus of Virginia Polytechnic Institute (Virginia Tech). It was the deadliest school shooting in American history.[1]

Two days later, Attorney General Roy Cooper brought together University of North Carolina (UNC) System President Erskine Bowles, UNC Board of Governors Chair Jim W. Phillips, Jr., North Carolina Community College System President Martin Lancaster, and North Carolina Independent Colleges and Universities President Hope Williams to launch the Campus Safety Task Force (Task Force).

"Our goal is to learn from this horrible event and to use those lessons learned to better protect our North Carolina campuses," said Attorney General Cooper. "We owe it to parents, students, faculty, and staff at our colleges and universities to be ready if a similar tragedy ever happens here."

On June 11, 2007, Attorney General Cooper announced the 21-member Task Force. These mem-bers possess expertise in many areas, including law enforcement, campus administration, emergency management, and the justice system, and represent campuses ranging from urban to small town to rural settings.[2] J. Bradley Wilson, a member of the UNC Board of Governors and the former North Caro-lina Secretary of Crime Control and Public Safety, chaired the Task Force. The Task Force was assisted by the staff of the Attorney General's office. All Task Force meetings were open to the public.

This report reviews and recommends ways in which State policymakers, campuses, and law enforcement offices can improve response to an incident like the one at Virginia Tech. Additionally, this report high-lights the many significant steps our campuses have already taken to keep students and faculty safe.

As Hollis Stambaugh, Deputy Director of the Virginia Tech Review Panel, told Task Force mem-bers, "North Carolina is already ahead of the game."

SCOPE

Attorney General Cooper charged the Task Force with reviewing the state of campus security and recommending ways to better respond to a critical incident. He further asked that the Task Force limit its scope to critical incidents. A critical incident can include not only an active shooter but natural and man-made disasters such as hurricanes and chemical explosions.

Specifically, he asked the Task Force to consider the following:

1. Prevention of a critical incident, including increasing campus safety awareness and assessing whether particular students are a risk;

2. Preparedness for a critical incident, including better ways to use technology and to enhance coordination between schools and law enforcement;

3. Response to a critical incident, including the importance of having multi-hazard plans and crisis communications in place; and

4. Recovery from a critical incident, including how campuses can learn from past tragic events.

METHODOLOGY

During three meetings held in Raleigh, Charlotte, and Greensboro from June to September 2007, Task Force members heard from more than 30 experts, including educators, law enforcement officials, emergency management experts, victims' advocates, and psychologists. Notably, the Task Force members heard from Federal Bureau of Investigation (FBI) Supervisory Senior Resident Agent Kevin Foust of Roanoke, Virginia, a first responder to the Virginia Tech shooting; and Ms. Stambaugh, Director of the Center for Public Protection for TriData, who served as Deputy Director of the Virginia Tech Review Panel (see Appendix for meeting agendas).

To complement the expertise of the members and testifying parties, staff also conducted an extensive literature review, including campus safety task force reports issued by the United States Department of Justice, Florida, Ohio, and New Mexico. During the time of the Task Force meetings, three important reports were issued that guided these findings and recommendations: (1) *Mass Shootings at Virginia Tech April 16, 2007: Report of the Review Panel Presented to Governor Kaine, Commonwealth of Virginia;* (2) *Report to the President on Issues Raised by the Virginia Tech Tragedy;* and (3) *Confidential Presidential Working Papers* issued by Virginia Tech.

Also, staff benefited from Attorney General Cooper's participation as a member of the National Association of Attorneys General's School Security Task Force, which convened after the Virginia Tech shooting. That Task Force looked at issues ranging from mental health to privacy.

Finally, this report draws upon an extensive web-based survey conducted in late October and early November 2007 of 110 public universities, community colleges, and private institutions. The 101 question survey elicited a 95 percent response rate with data from 105 campuses. This survey was designed to assess campus safety and security by focusing on training and perceptions about handling critical events. Professor Deborah Weisel of North Carolina State University School of Public and International Affairs worked closely with the Center for Urban Affairs and Community Services to administer this survey. Funding for the survey was made possible from the Governor's Crime Commission, the North Carolina Association of Campus Law Enforcement Administrators, and the North Carolina Department of Justice (NC DOJ).

CAMPUS VIOLENCE IN NORTH CAROLINA

Despite the Virginia Tech shooting, homicides on campus remain a rare event. According to the United States Department of Education, our country's 4,200 campuses, home to 17.5 million students, report 15 murders a year.[3] That number translates into a significantly lower murder rate compared to the national rate. In 2004, the most recent data available, the murder rate was 0.28 per 100,000 people on campuses compared to 5.5 per 100,000 people nationally.[4]

Like the national trend, UNC campuses, for example, are safer than the rest of the State's general population. The 2004 UNC *Task Force of Safety of the Campus Community* pointed out that the crime rate on these member campuses was one-sixth of the crime rate of the State as a whole.[5] Moreover, according to the NC DOJ survey, slightly more than half of our campuses report no critical incidents in the last three years while only one in three campuses report one or two events during this time.

Still, North Carolina campuses have experienced critical incidents such as:

Catawba College.
On January 25, 2002, a Catawba College football player was shot dead after a late-night argument between students from Catawba and nearby Livingstone College. Two students from Catawba and two students from Livingstone were also wounded after a shootout with a Catawba officer.[6]

University of North Carolina at Wilmington.
Between May and June 2004, two students were murdered. On May 4, 2004, a female freshman was drugged, raped, and strangled in a dorm by a fellow student. On June 4, 2004, another female student was shot to death by a former student in her off-campus apartment.[7]

University of North Carolina at Chapel Hill.
On March 3, 2006, Mohammed Reza Taheri-azar, a recent graduate, drove a Jeep Cherokee into a lunchtime crowd on campus injuring nine people. According to an FBI agent, Taheri-azar "allegedly made statements that he acted to avenge treatment of Muslims."[8]

The NC DOJ survey found that these critical incidents can happen anywhere. In fact, among campuses with five or more critical incidents in the last three years, four out of six occurred on campuses with a student body population of less than 1,000. Furthermore, half of these campuses with five or more critical incidents in the last three years are located in a rural area or small town. (See Table 1.)

Table 1: Campuses That Have Experienced a Critical Incident in the Last Three Years

Number of Critical Incidents	Percentage
0	53%
1-2	32%
3-4	9%
5-9	6%

CAMPUS SECURITY IN NORTH CAROLINA

One of the principal challenges for recommending improvements to campus security rests on the diversity and complexity of postsecondary institutions. Today, there are 110 postsecondary institutions serving almost 1.2 million students. These include the 16 UNC member campuses, 58 community colleges, and 36 private colleges and universities.[9]

Some universities are like small cities pursuing cutting-edge research and housing classified documents. Other campuses have one campus with multiple buildings. According to the NC DOJ survey, the residential population of campuses ranges from less than 300 students to more than 7,000 students. Similarly, the daily population of students ranges from 500 students to more than 20,000 students.

Generally, campus security personnel fall into one of two categories:

Sworn police officers: Sworn police officers have greater training and enforcement functions and possess better equipment. For example, the NC DOJ survey found that most sworn officers have crisis intervention and HazMat training. In addition, sworn officers can possess a firearm[10] on a campus and make arrests.[11]

Security guards: Security guards are less likely to have crisis intervention and HazMat training. They generally cannot possess a firearm on campus.[12] Additionally, they lack the authority to make arrests.[13] However, like sworn officers, they play an important role in protecting faculty, staff, and students on campus.

Table 2: Training and Enforcement Functions of Sworn Officers and Security Guards

	Sworn Officers	Security Guards
Training		
Crisis intervention	53 %	17 %
HazMat	75 %	36 %
Enforcement Functions		
Respond to serious crimes	100 %	48 %
Conduct follow-up investigations of serious crimes	100 %	26 %
Arrest and book criminal suspects	100 %	7 %
Respond to minor offenses such as larcenies	100 %	69 %
Provide crime prevention training	83 %	36 %
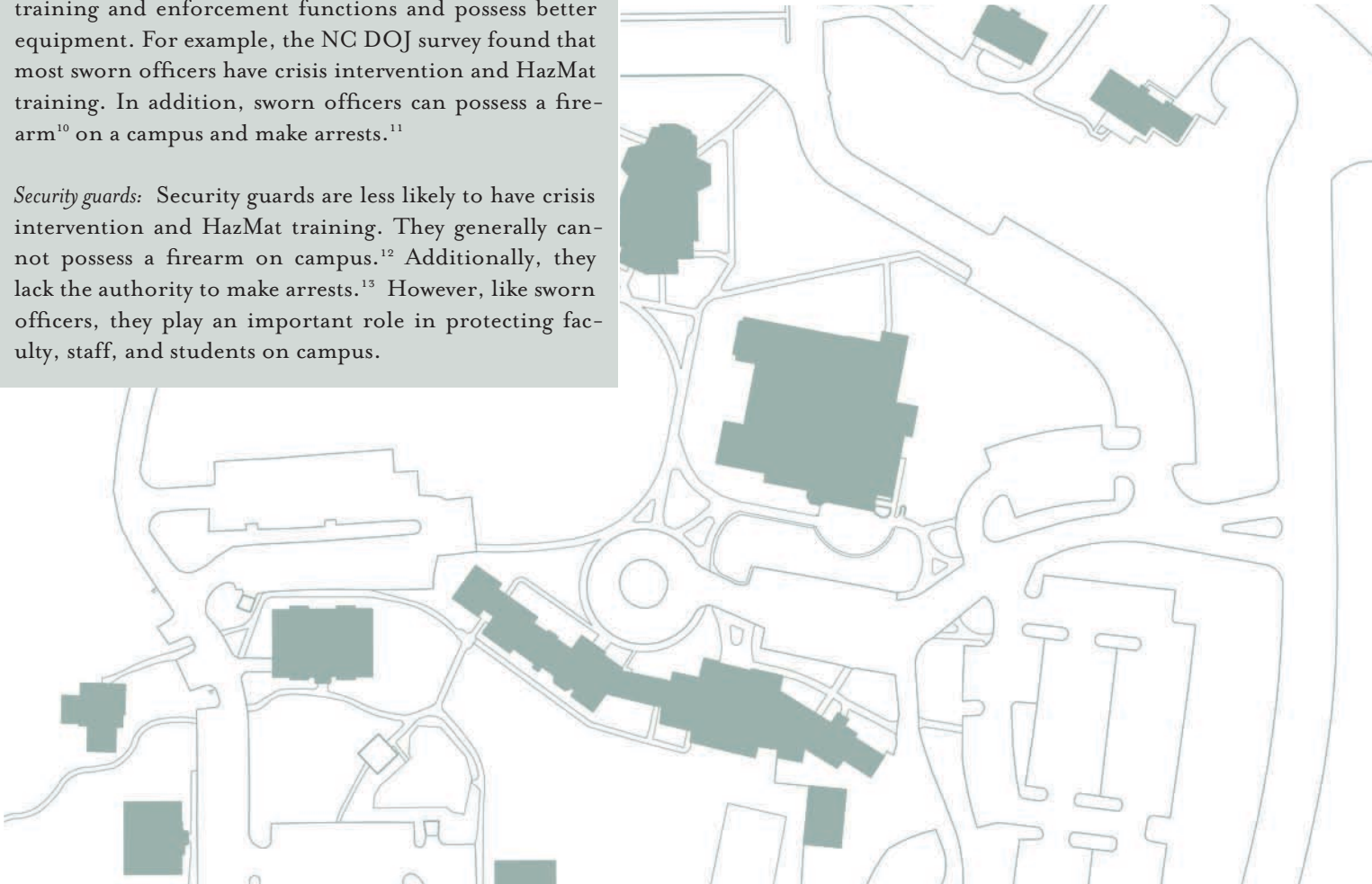
The daily and residential population of a campus influences the kind of security and police services provided. Of the 105 campuses surveyed, 40 of them (38 percent) reported having their own police agencies. Predictably, sworn police officers are more common among campuses with larger daytime populations and more on-campus residents. Eight out of ten campuses (81 percent) with a daily population of 5,000 or more students have sworn campus police. Three out of four campuses (75 percent) with residential students also have this kind of security. These 40 campus police agencies employ 643 sworn police officers. The number of officers in these agencies ranges from one to more than 60 officers.

Security guards are either employed directly by the campus or under contract with a private security company. Of the 105 campuses surveyed, 58 of them (60 percent) have security guards. These 58 campuses employ 637 security guards, a number close to that of sworn officers on campuses.

The campus security make up is further complicated by the fact that two-thirds of our campuses with sworn officers also employ security guards. In other instances, campuses have agreements with local police agencies to provide dedicated officers to their campuses. Other campuses hire off-duty sworn officers. David Rainer, Associate Vice Chancellor for Environmental Health and Safety for North Carolina State University, summed it up this way for the Task Force: "Our campuses are extraordinarily different. We have different capabilities. We have different funding mechanisms. We have different styles."

These differences also point to why a one-size-fits-all approach on campus safety is not workable. As Attorney General Cooper said during his comments to the Task Force, "We must provide for a flexible framework taking into account size, location, and resources."

[1] Jack, Jennifer L. 2007. The 10 deadliest U.S. school shootings. *U.S. News & World Report*, April 16.

[2] Five members of the Attorney General's Task Force also served on the UNC Campus Safety Task Force which issued its report to UNC System President Erskine Bowles in November 2007. Both staff and Task Force members benefited from the UNC report and the three subcommittees' meetings and reports.

[3] Frank, Thomas. 2007. Campus killers' warnings ignored. *USA Today*, June 12, National News section.

[4] Kingsbury, Alex. 2007. Toward a safer campus. *U.S. News & World Report*, April 22.

[5] The University of North Carolina. 2004. *Task Force on the Safety of the Campus Community.* Chapel Hill, December, p i.

[6] Associated Press. 2002. Catawba football player, four others injured in shooting. *Associated Press,* January 27, State & Local wire. See also Hoover, Eric. 2002. A deadly shooting pierces 2 small colleges. *The Chronicle of Higher Education,* February 8, p. 37.

[7] Little, Ken. 2004. A campus remembers; Two slain students honored at UNC-W Celebration of Life. *Wilmington Star-News,* Sept. 27, Local News section.

[8] Arounnarath, Meiling, and Lisa Hoppenjans. 2006. 6 hurt as driver plows into students. *News & Observer,* March 4, State and Local News section.

[9] The number of private colleges and universities reflects those institutions which are members of North Carolina Independent Colleges and Universities.

[10] N.C.G.S. § 14-269.2 (2007). See also 12 N.C.A.C. 09C .0303 (2007).

[11] Under State law, sworn officers can only make arrests in their jurisdiction with limited exceptions. N.C.G.S. § 15A-402 (2007).

[12] N.C.G.S. § 14-269.2 (2007).

[13] In order to exercise the power of arrest, individuals are required to go through the certification process and be administered the oath of office pursuant to 12 N.C.A.C. 09C .0303. Chapter 74C of the North Carolina General Statutes governs security guards, and does not contain this provision. See also N.C.G.S. § 15A-402 (2007).

PREVENTION

Finding 1: Threat assessment is an important preventive measure against a critical incident

The Virginia Tech tragedy demonstrates the importance of identifying threats and sharing information. During the Greensboro Task Force meeting, Hollis Stambaugh, Deputy Director of the Virginia Tech Review Panel, said perpetrator Seung Hui Cho showed many warning signs that went undetected by educators. "They [Virginia Tech] were completely unaware of all the problems in the years and months leading up to this past April," Ms. Stambaugh told the Task Force. In its findings, the Virginia Tech Review Panel said a number of individuals and departments knew about each of Cho's incidents. However, "[n]o one knew all the information and no one connected all the dots."[14]

Similarly, primary and secondary school shootings show that perpetrators leave clues and often share information with someone. After a number of school shootings in 1999, the United States Secret Service joined with the

United States Department of Education (DOE) to study 37 school shootings involving 41 attackers who were current or recent students at the school.[15] The report found that the attacks were rarely impulsive.[16] In more than three-fourths of the incidents, the perpetrator planned the attack.[17] In addition, the report revealed that prior to most incidents, the attacker told someone about the plan.[18]

The Task Force believes that identifying potentially violent students as early as possible is one of the best preventive measures a campus can take. Task Force members heard about the University of North Carolina-Greensboro's (UNC-G) threat assessment team which regularly reviews a list of warning signs associated with possible troubled students. Task Force members also heard from Kemal Atkins, University of North Carolina (UNC) Director for Academic and Student Affairs. Mr. Atkins said the UNC System recommends that each member campus have threat assessment teams in place.[19]

Recommendation 1: Campuses should establish threat assessment teams

The Task Force recommends that each campus establish a campus threat assessment team. The Task Force believes the teams should:

- Help faculty, staff, and students recognize the signs of mental illness that may suggest that an individual is a possible danger to himself or others; and

- Improve awareness among faculty, staff, and students about resources to help an individual who is a possible danger to himself or others.

In addition, the Task Force recommends that admissions and human relations offices should be trained to perform a comprehensive review of applications to look for signs and gaps. The threat assessment team, in turn, should evaluate flagged applicants.

Finding 2: Some campus administrators and mental health professionals lack understanding of student privacy laws

The Task Force believes that some campus administrators and mental health professionals lack an understanding about student privacy laws. As Skip Capone, General Counsel for UNC-G, said during his presentation to the Task Force, "There are a lot of myths about information sharing." In fact, the NC DOJ survey found that over half (53 percent) of campuses said that mental health information cannot be shared because it is prohibited by law.

This confusion has been echoed by national observers. Peter Lake, director of the Center for Excellence in Higher Education Law and Policy at Stetson University, said these laws are so confusing that they have produced "massive misunderstanding."[20] A report by three federal Cabinet officials to the President of the United States on issues raised by the Virginia Tech shooting observed, "A consistent theme and broad perception in our meetings was . . . confusion and differing interpretations about state and federal privacy laws and regulations."[21]

This lack of understanding has generated myths held by some campus administrators that they cannot properly respond to troubled students. As a general rule, the Family Educational Rights and Privacy Act (FERPA) prohibits sharing "educational records" without student consent. One FERPA myth, according to Mr. Capone, has been that faculty or staff members cannot share information with parents. However, as he pointed out to the Task Force, student information may be shared with parents who claim their child as a tax-dependent. Additionally, in a health and safety emergency, information from student records may be shared with anyone who has a legitimate need to know. (See Figure 1.) He summarized, "The regulation is replete with exceptions, and sometimes people just don't bother to read those."

Figure 1: Myth or Reality?

Law	Myth	Reality
FERPA	Student records may not be shared with anyone.	Student records may be shared in a health or safety emergency.
HIPPA	Student medical records originating on campus may not be shared.	HIPAA does not apply to student medical records.
ADA/504	Medical records regarding a mental disability may not be shared.	ADA/504 are not confidentiality statutes. Further, both have health and safety exceptions.
NC State Law	Confidentiality statutes prohibit sharing of mental health information.	Mental health information may be shared when there is an imminent health and safety danger.

Source: Capone, Skip. Campus Safety Task Force meeting. September 11, 2007, Greensboro, NC.

Recommendation 2: Campus administrators and mental health professionals should be provided accurate guidance about student privacy laws

The Task Force recommends that campus administrators and mental health professionals get accurate guidance about student privacy laws. This information should come from the Attorney General's Office, the UNC System, the North Carolina Community College System, and North Carolina Independent Colleges and Universities. This guidance should be disseminated among all campuses in a way that can be easily understood. As a starting point, the Task Force recommends that campuses provide the United States DOE documents entitled *Disclosure of Information from Education Records to Parents of Postsecondary Students* and *Balancing Student Privacy and School Safety: A Guide to the Family Educational Rights and Privacy Act for Colleges and Universities* to staff.[22] In short, it is imperative that campuses understand the legal parameters of federal and State laws relating to privacy rights of students.

Finding 3: Sheriffs cannot determine whether a gun permit applicant has been involuntarily committed

One of the major findings of the Virginia Tech Review Panel was Cho's ability to purchase two guns from registered gun dealers, even though he had been involuntarily committed. Federal law prohibits anyone from buying a gun who has been "committed to a mental institution"[23] which includes individuals who have been involuntarily committed.[24] In December 2005, a special justice of Virginia district court committed Cho involuntarily because he was regarded as a danger to himself. Thus, under federal law, Cho should have been immediately disqualified from purchasing a gun. But the judge's ruling did not appear on Cho's background check.[25] Accordingly, Attorney General Cooper requested the Task Force to examine whether mental health commitments should be shared with State and federal authorities for gun permit checks.

According to the Federal Bureau of Investigation, North Carolina is one of 22 states that reports mental health-related information to the National Instant Criminal Background Check System (NICS).[26] However, as a general rule, such records are confidential. Occasionally, county sheriffs come into possession of such information from processing concealed carry permit applications where the applicant must sign a release for the information. In such cases, the sheriff will forward the information to NICS.[27] As a result of the current arrangement, North Carolina has filed only 319 mental-health related denials to NICS compared to 80,000 entries in Virginia.[28]

Recommendation 3: North Carolina should prohibit those who have been involuntarily committed from purchasing guns by reporting this information to the National Instant Background Check System

The Task Force recommends that the North Carolina General Assembly direct county Clerks of Court to share involuntary commitment orders with NICS. As part of this recommendation, the Task Force also recommends that the State examine a process to grant relief to individuals who have been involuntarily committed and are seeking to purchase a gun provided that they can demonstrate that they have recovered from their mental illness.

[14] Commonwealth of Virginia. 2007. *Mass Shootings at Virginia Tech April 16, 2007: Report of the Review Panel Presented to Governor Kaine, Commonwealth of Virginia.* Virginia Tech Review Panel. August, p. 2.

[15] Vossekuil, B., Fein, R., Reddy, M., Borum, R., & Modzeleski, W. 2002. *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States.* U.S. Department of Education, Office of Elementary and Secondary Education, Safe and Drug-Free Schools Program and U.S. Secret Service, National Threat Assessment Center, Washington, D.C..

[16] Ibid., p. 23.

[17] Ibid., p. 24.

[18] Ibid., p. 25.

[19] These recommendations have been formally made in both University of North Carolina campus safety task force reports of December 2004 and November 2007. The University of North Carolina. *Campus Safety Task Force Report to the President.* p 10. See also The University of North Carolina. *Task Force on the Safety of the Campus Community.* p. 9.

[20] Shuchman, Miriam. 2007. FERPA, HIPAA, and the Privacy of College Students. In Falling through the Cracks — Virginia Tech and the Restructuring of College Mental Health Services. *New England Journal of Medicine.* 357 (2): 109.

[21] Gonzales, A., Michael Leavitt, and Margaret Spellings. *Report to the President on Issues Raised by the Virginia Tech Tragedy.* U.S. Department of Justice, U.S. Department of Health and Human Services, and U.S. Department of Education. June 13, 2007.

[22] U.S. Department of Education. *Disclosure of Information from Education Records to Parents of Postsecondary Students.* http://www.ed.gov/policy/gen/guid/fpco/hottopics/ht-parents-postsecstudents.html (accessed December 20, 2007). See also U.S. Department of Education. *Balancing Student Privacy and School Safety: A Guide to the Family Educational Rights and Privacy Act for Colleges and Universities.* Family Policy Compliance Office. http://www.ed.gov/policy/gen/guid/fpco/brochures/elsec.pdf (accessed December 31, 2007).

[23] 18 U.S.C. 922(g)(4) (2007).

[24] 27 C.F.R. § 478.11 (2007).

[25] Commonwealth of Virginia. *Report of the Review Panel.* p. 71.

[26] Regional Justice Information Service. 2005. *Survey of State Procedures Related to Firearm Sales, 2005.* U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics, St. Louis, Missouri.

[27] U.S.C. §§ 922(s) & (t) (2007).

[28] Aldridge, John J. III. Conversation with Lisa Mares. 14 December 2007.

Finding 4: Many campuses do not use the Incident Command System

During the Task Force meetings, members heard from Scott Bullard, Director for Emergency Management for the North Carolina Community Colleges, who discussed the importance of campuses establishing crisis response teams based on the Incident Command System (ICS). Today, ICS is part of the new National Incident Management System (NIMS) which provides a "consistent template" for local, state, and federal agencies to prepare and respond to an emergency.[29] As Mr. Bullard put it, "NIMS is the right thing to do to get everyone on a common sheet of music." Last year, the North Carolina Department of Justice (NC DOJ) and North Carolina Department of Crime Control and Public Safety recommended that every K-12 school receive more multi-hazard training.[30] In 2005, Governor Mike Easley directed all counties to use NIMS for all incidents.[31] Aside from consistency, Mr. Bullard noted that NIMS is scalable and easily adaptable. For example, it can be used for a large scale concert as well as a small campus event.

The NC DOJ survey found that less than half of campuses state that local law enforcement officers and emergency managers are "very knowledgeable" about names of dormitories or classroom buildings, their location, and their use and building entrances. The Task Force believes that during a critical incident all law enforcement officers must know about the location of a gunman in a classroom and details about campus infrastructure. They must be able to respond quickly, as the Virginia Tech police did.

Table 3: Knowledge of Dormitories, Classroom Location, and Building Entrances		
	Myth	Reality
Extent of Knowledge	Law Enforcement Officers	Emergency Managers
Very knowledgeable	43 %	37 %
Somewhat knowledgeable	45 %	51 %
Not very knowledge or no knowledge	13 %	13 %

Recommendation 4: Campuses should adopt emergency plans that integrate into the National Incident Management System

The Task Force recommends that all North Carolina campuses adopt emergency plans that are NIMS compliant. This point was reiterated to the Task Force by Hollis Stambaugh, Deputy Director of the Virginia Tech Review Panel. The Virginia Tech Review Panel found that "[a] unified command post should have been established and operated based on the NIMS and ICS model."[32] Ms. Stambaugh noted that as a result of this failure, an emergency operations center was not opened immediately, resulting in communication and coordination problems.

Related to this recommendation, the Task Force suggests that the North Carolina Association of Campus Law Enforcement Administrators work closely with the North Carolina Justice Academy to reassess and develop a campus safety training course which highlights the importance of NIMS. They should also focus on effective methods of delivering this training. Several speakers, including Mr. Bullard, State Bureau of Investigation Agent Eric Tellefsen, and Bud Cesena, Director of School Law Enforcement for the Charlotte-Mecklenburg School District, recommended that administrators and staff take the *Introduction to Incident Command System* course available from the Federal Emergency Management Agency (FEMA).[33]

Finding 5: Some campuses have mutual aid agreements or memoranda of understanding with local law enforcement

As part of establishing NIMS-compliant emergency plans, many campuses enter into a memorandum of understanding (MOU) or mutual aid agreement with local law enforcement agencies and first responders. A mutual aid agreement is a written arrangement between two or more agencies to provide reciprocal assistance. While an MOU can be reciprocal in nature, it can also pledge assistance to an organization without mutual benefits. Both types of agreements set out the roles and responsibilities for participating agencies.

The kinds of agreements campuses draw up vary according to the types of security personnel campuses have. A campus would want an MOU with local law enforcement agencies and first responders in the event that an active shooter incident takes place on a campus with an unarmed security guard. This would ensure immediate assistance from armed personnel. These agreements can have other benefits as well. For instance, smaller campuses can use an MOU with another campus to provide temporary housing for their students.[34]

Based on the NC DOJ survey, 39 percent of campuses have a mutual aid agreement with local law enforcement and 30 percent of campuses have an MOU. Specifically, the survey found that public universities are more likely to have mutual aid agreements than are community colleges or private colleges or universities.

Table 4: Campuses That Have Executed a Mutual Aid Agreement or MOU		
Type of Institution	Mutual Aid Agreement	MOU
Community Colleges	21 %	32 %
Private Colleges or Universities	47 %	27 %
Public Universities	87 %	27 %
Overall	39 %	30 %

Recommendation 5: Campuses should enter into mutual aid agreements or MOUs with key partners where relevant

The Task Force recommends that all campuses, particularly those without sworn police officers, develop and enter into agreements with key partners, such as local law enforcement agencies and first responders. Specifically, the Task Force recommends that campuses review resources such as FEMA's *National Mutual Aid and Resource Management Initiative*[35] and the North Carolina Division of Emergency Management's Mutual Aid System.[36] These resources enhance the ability of any jurisdiction to respond to an incident through the use of mutual aid. Furthermore, the Task Force believes that the recommended Center for Campus Safety (see Recommendation 11) should sponsor seminars bringing together federal, State, and local agencies, and campus police to enhance collaboration and cooperation.[37]

Finding 6: Half of the campuses participate in county or regional preparedness training

After campuses have developed a NIMS-compliant emergency plan and drafted MOUs, they should test whether everything works together. Mark Goodman, Director of Onslow County Emergency Services, told the Task Force that campuses must exercise the plan, fix the gaps in the plan, and review the plan again. This testing can include emergency drills, role playing, and tabletop exercises. Testing of the emergency plan ensures that everyone speaks the same language and knows their respective role.

The NC DOJ survey found that around half of the campuses participate in county or regional preparedness training. Furthermore, 14 percent of campuses do not conduct any practical trainings or exercises.

Table 5: Campuses That Conduct Practical Trainings or Exercises

Type of Practical Training or Exercises	Percentage
Local or regional emergency preparedness training	55 %
County emergency management	45 %
Cross-training with local law enforcement agencies	37 %
Tabletop or scenario exercises with local agencies	35 %
No Practical Training or Exercises	14 %

Recommendation 6: Campuses should practice and regularly update their emergency plans

The Task Force recommends that campuses evaluate and practice their emergency plans. Mr. Goodman and William Lassiter, Manager of the Center for Prevention of School Violence, suggested that third-party evaluation of emergency plans is an effective means of assessment. This kind of outside review also guarantees that emergency plan participants are not adopting the wrong protocol. As SBI Agent Tellefsen pointed out, practicing improper methods merely entrenches mistakes.

The Task Force also urges campuses to regularly update their emergency plans. As FEMA observes, "One of the greatest long-term challenges to disaster resistance is waning interest in hazard mitigation. Disasters fade into the past, and committed university and community leaders or supporters can change their priorities, their minds, or their jobs."[38]

[29] International Association of Campus Law Enforcement Administrators. 2006. *Strengthening Communications Between Campus Public Safety and Federal, State, & Local Emergency Responders.* IACLEA Domestic Preparedness Committee, Communications Subcommittee. October 10, pp. 11–14. See also Bush, George W. 2003. *Homeland Security Presidential Directive-5.* The White House. February 28, Washington, D.C.

[30] Easley, Michael F. 2005. *Proclamation for Adoption of National Incident Management System (NIMS).* North Carolina Office of the Governor. May 1, Raleigh, NC.

[31] Bullard, Scott. Campus Safety Task Force meeting. September 11, 2007, Greensboro, NC.

[32] Commonwealth of Virginia. *Report of the Review Panel.* p. 122.

[33] This course, IS-100, is available for free on the FEMA web site: http://www.fema.gov/library/index.jsp.

[34] Harwood, Matt. 2007. Preventing the Next Campus Shooting. *Security Management,* August, p. 62.

[35] For more information, visit http://www.fema.gov/emergency/nims/rm/ma.shtm.

[36] For more information, visit http://www.dem.dcc.state.nc.us/.

[37] United States Department of Justice, Office of Community Oriented Policing Services. 2005. *National Summit on Campus Public Safety.* Mid-Atlantic Regional Community Policing Institute. July, Washington, D.C., p. 58.

[38] U.S. Department of Homeland Security. 2003. *Building a Disaster-Resistant University.* Federal Emergency Management Agency. August, Washington, D.C., p. 47.

RESPONSE

Finding 7: Faculty, staff, and students need training to respond to a critical incident

North Carolina offers training to faculty and staff at secondary schools so educators know how to respond to a critical incident. But many faculty, staff, and students lack similar preparation at the postsecondary level.

Federal Bureau of Investigation (FBI) Agent Kevin Foust of Roanoke, Virginia discussed the varied responses by Virginia Tech faculty, staff, and students with the Task Force. These responses, now found in the Virginia Tech Review Panel report,[39] illustrate the need for better training.

For example, on the morning of April 16, a faculty member found the shooter's note inside a set of chained doors "warning that a bomb would go off if anyone tried to remove the chains."[40] Contrary to university protocol that police be contacted immediately about a bomb threat, the faculty member carried the note to the dean's office. "Had the . . . bomb threat note been promptly reported prior to the start of the shooting, the police

might have arrived at the building sooner than they did," the Virginia Tech Review panel observed.[41] In another instance, a female student found the entrance of the building where the shooter was located chained. She climbed through a window to get into the building. The Virginia Tech Review panel again noted that "[s]he did not report the chains, assuming they had something to do with ongoing construction."[42]

The Task Force believes the entire campus community shares responsibility for its safety and such safety cannot be guaranteed only with well-trained security personnel and mental health professionals. Rather, faculty, staff, and students play an important role in reducing potential threats on campus.

The Task Force also notes two highlights from the North Carolina Department of Justice (NC DOJ) survey. First, more respondents believe that faculty, staff, and students should also be trained as sworn officers and security guards are.

Table 6: Campuses That Indicate Training is Needed for Critical Incidents

Training Needs	Percentage
Training for faculty and staff	85 %
Training for administrators	78 %
Training for students	70 %
More training security guards	60 %
Specialized training for sworn officers	44 %

Second, most respondents state the role of faculty and staff is to secure classrooms and direct students. However, one quarter (26 percent) of the campuses report that the role of faculty and staff is not defined.

Table 7: Campuses That Define the Role of Faculty and Staff

Role of Faculty and Staff	Percentage
Secure classroom	64 %
Provide direction to students	73 %
Role is not defined	26 %

Recommendation 7: Campuses should educate and train faculty, staff, and students as part of their emergency plans

The Task Force recommends that campuses institute training programs to educate faculty, staff, and students about emergency response. This recommendation is underscored by the testimony from State Bureau of Investigation Agent Eric Tellefsen who told the Task Force that faculty, staff, and students comprise key components in responding effectively to a critical incident. "If a gunman enters a classroom today, a college professor needs to know what to tell his students," he said. "He shouldn't tell them to hide under a desk, putting themselves at the mercy of the killer. He needs to point them to the closest exit."

Finding 8: North Carolina campuses have a variety of notification systems in place and a one-size-fits-all approach is not practical

The Task Force heard from William Booth of Risk Management Associates who reviewed the different types of notification systems available for campuses. During his presentation, Mr. Booth drew from a recent Homeland Security study of campus notification systems conducted by the University of Central Florida.[43] These notification systems include reverse 911, emails, text messages, web alerts, fire alarms, public address systems, and siren systems. According to the NC DOJ survey, our campuses employ a variety of notification systems. Seven out of ten campuses post alerts on their websites and use mass emails. However, less than one in ten campuses has a siren system or campus-wide public address system.

Table 8: Campuses with Notification Systems in Place and in Need of Adoption or Improvement

Type of Notification System	In Place	Needs Adoption / Improvement
Alerts posted on Web site	71 %	N/A
Mass email capability	69 %	32 %
Mass text capability	28 %	47 %
Call tree	26 %	12 %
Reverse 911	15 %	35 %
Siren system	14 %	33 %
Fire alarms with voice intercom	11 %	44 %
Campus-wide public address system	9 %	67 %
High-powered voice and siren system	6 %	50 %

The Task Force believes that a reliable campus notification system is a critical part of an emergency plan. Communicating with students, faculty, and staff can save lives. In fact, according to the NC DOJ survey, almost three out of four campuses identified notification systems as important to adequately prepare for an emergency.

However, the Task Force also notes that notification systems have limitations. Large campuses, for example, have experienced cell phone delays or outages during athletic events. These cell carriers are designed to support normal traffic and not handle the increase in calls generated from an emergency. Similarly, high-powered voice and siren systems have separate challenges. These systems are limited by the coverage area; moreover, many individuals hearing such a siren are unsure of how to respond appropriately. The NC DOJ survey found, for example, that only 35 percent of faculty and 25 percent of students are trained to use notification tools. Given these limitations, the Task Force believes a one-size-fits-all approach in selecting notification systems is not practicable.

Recommendation 8: Campuses should adopt multiple, redundant notification systems and rigorously evaluate such systems

The Task Force recommends that campuses consider adopting multiple, redundant notification systems. This approach ensures that the alert system is reaching as many people as possible. Based on the NC DOJ survey, many campuses are in the process of adopting or improving upon notification systems in place, particularly with low-tech alert systems such as high-powered voice sirens and fire alarm with voice intercom

Before adopting any notification system, the Task Force also recommends these notification systems be evaluated rigorously. Because of the numerous sales by vendors to campuses after the Virginia Tech tragedy, these systems should be tested against the promised specifications and advertising. During Mr. Booth's presentation to the Task Force, he urged campuses to ask several questions about the systems including: (1) how many individuals and students the system can reach; (2) whether the vendor provides customer service 24 hours a day, 7 days a week; and (3) whether the vendor can provide notice that the recipient received the notification.

Finding 9: Many campuses are unaware of the State's interoperability communications system

The Virginia Tech shooting emphasizes the importance of interoperability communications among first responders. The International Association of Campus Law Enforcement Administrators defines interoperability to mean that public safety officials have "the ability to talk with whom they want, when they want, when authorized, but not the ability to talk with everyone all of the time."[44] The importance of such communication was made clear by two national tragedies: the Columbine high school shootings and the terrorist attacks of September 11, 2001. The National Governor's Association Center for Best Practices has identified interoperable communications as one of the country's top homeland security problems. It notes that the lack of "[i]nteroperability is a serious, pressing public safety problem that severely undermines the capacities of law enforcement, firefighters, and other first responders to respond to and manage emergency situations."[45]

In North Carolina, the State has made developing a statewide interoperability solution a priority. The Department of Crime Control and Public Safety and Governor's Crime Commission are implementing the Voice Interoperability Plan for Emergency Responders (VIPER) across the State. Task Force members heard from Captain Alan Melvin of the State Highway Patrol who discussed the implementation of VIPER among campuses. Captain Melvin pointed out that only six out of the 16 public universities use the VIPER system. Some reasons campuses do not use the VIPER system are a lack of funding and/or a lack of information about it.

Recommendation 9: Campuses should partner with local law enforcement and first responders to ensure interoperable communications

The Task Force recommends that campuses partner with law enforcement to ensure interoperability. For example, campuses could consider integrating into the statewide interoperability system by purchasing proper equipment and entering into memoranda of understanding with local law enforcement agencies and first responders. Regardless, campuses should contact local law enforcement, first responders, and other agencies which are likely to respond to an incident to ensure interoperability. Such coordination should result in identifying alternative communication methods, including digital radio systems or Voice over Internet Protocol.[46]

[39] Commonwealth of Virginia. *Report of the Review Panel.*
[40] Ibid., 89.
[41] Ibid., 89-90.
[42] Ibid., 90.
[43] Wei, Dr. L. and Dr. J. Pearson. 2006. *Emergency communication systems for Florida university and community college campuses.* University of Central Florida. February 23.
[44] IACLEA. *Strengthening Communications.* p. 18.
[45] North Carolina Department of Crime Control and Public Safety. *VIPER: Voice Interoperability Plan for Emergency Responders.* http://www.nc-crimecontrol.org (accessed December 17, 2007).
[46] IACLEA. *Strengthening Communications.* pp. 21-22.

RECOVERY

Finding 10: Many campuses provide victim counseling services but few have victim and family communication plans

During the Greensboro Task Force meeting, members heard from President Maureen Hartford of Meredith College who provided two contrasting case studies in how campuses respond to victims and their families. She began with Lehigh University where a student was tortured, raped, sodomized, and murdered. Under guidance from attorneys, the administration kept its distance from the victim's family. "They worked from the fear of litigation rather than compassion," President Hartford said. These factors angered the victim's family and ultimately resulted in the passage of the Clery Act. This federal law requires universities to disclose crime on their campus.[47]

President Hartford then discussed an incident in which a student was stabbed to death and her attacker shot by campus police at the University of Michigan. Many students in on-campus family housing witnessed the incident. Here, administrators addressed the situation by trying to heal the community rather than avoid a lawsuit.

The university provided psychologists and psychiatrists to students. "The President was with the grieving family every step of the way," said President Hartford. From these two different examples, President Hartford advised campuses to provide compassion, including qualified, well-trained mental health professionals to the victims and their families.

During her testimony, Hollis Stambaugh, Deputy Director of the Virginia Tech Review Panel, echoed President Hartford's comments that treatment of victims and families must be done in a more caring manner. She referred to the Virginia Tech Review Panel's report which found that "[n]umerous families reported frustration with poor communication and organization in the university's outreach following the tragedy."[48]

The North Carolina Department of Justice (NC DOJ) survey found that 81 percent of campuses have drafted a plan to provide counseling services to students, staff, and faculty after a critical incident. It also found that 69 percent of campuses have drafted a plan to provide victim counseling services. However, the NC DOJ survey also revealed that only 39 percent of campuses have drafted a plan to communicate with victims and families following an event.

Recommendation 10: Campuses should incorporate victim counseling services in their emergency plans and establish a system of regular briefings for victims' families

The Task Force recommends that all campuses incorporate counseling services in their emergency plans. As Sandra Warstki, Chair of the Disaster Committee for the North Carolina Psychological Association, emphasized to the Task Force, no one is untouched in a disaster. "The psychological magnitude of a disaster is often many times greater than the medical and physical magnitude," she said.

Also, the Task Force notes the small number of campuses that have plans for communicating with victims' families. Campuses should develop plans for regular briefings for victims' families, particularly in light of the testimony from President Hartford, Ms. Stambaugh, and the Virginia Tech Review Panel report.

Finding 11: Campuses lack a centralized source of information about "best practices" in campus safety

The NC DOJ survey found that campuses in our State look to a wide variety of sources for information about "best practices" in campus safety. Campuses with large police agencies appear more likely to rely on similar and nearby campuses, the International Association of Campus Law Enforcement Administrators, Criminal Justice Training and Standards Division, and the North Carolina Association of Campus Law Enforcement Administrators. Campuses without sworn agencies look to similar and nearby campuses also, but rely more heavily on local law enforcement agencies. One thing remains clear from the survey data: there is no centralized source of information for campus safety practices.

Table 9: Where Campuses Look for Campus Safety Information

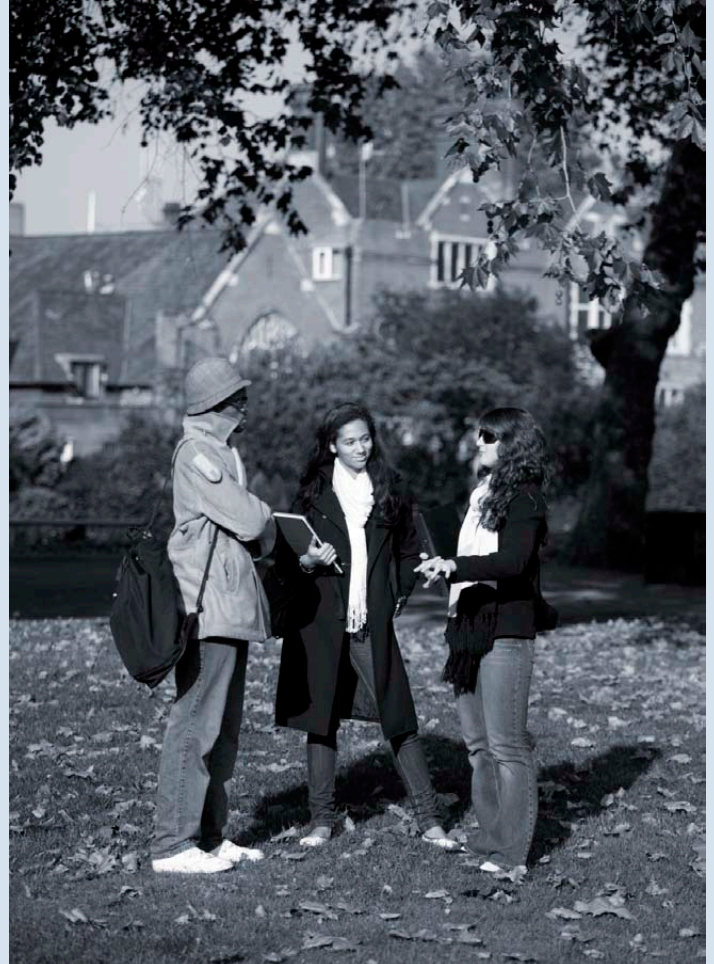| Source of Campus Safety Information	Campuses without Law Enforcement Agency	Campuses with Law Enforcement Agency
Local Law Enforcement Agency	85%	55%
Similar or Nearby Campuses	84%	81%
UNC General Administration	6%	19%
Community Colleges	53%	12%
North Carolina Independent Colleges and Universities	19%	21%
North Carolina Police Chiefs or Sheriffs' Association	11%	36%
Criminal Justice Training and Standards Division	6%	67%
North Carolina Justice Academy	5%	57%
International Association of Campus Law Enforcement Administrators	27%	52%
North Carolina Association of Campus Law Enforcement Administrators	40%	64%
Federal Emergency Management Agency	15%	29%
Publications	31%	55%

Recommendation 11: The State should establish a Center for Campus Safety to coordinate training programs, hold an annual summit, and share "best practices" information

[47] 20 U.S.C. § 1092(f) (2007).
[48] Commonwealth of Virginia. Report of the Review Panel. p. 146.

Like the Center for Prevention of School Violence, which was established in North Carolina as one of the country's first school safety centers in 1993, the State should consider establishing a Center for Campus Safety. The many topics discussed by the Task Force Members and recommendations found in this report are dynamic in nature. Because of new threats, new technologies, and the growth in North Carolina's student population, the Task Force recommends the establishment of the Center for Campus Safety which would coordinate training, host an annual summit, and share information about "best practices." The Center would also provide the chance for campuses to collaborate and share resources.

TASK FORCE MEETINGS AND AGENDAS

MEETING OF JUNE 13, 2007

Estey Hall
Shaw University
Raleigh, North Carolina

Welcome and Introductions
    J. Bradley Wilson
    Chair of the Task Force on Campus Safety

Challenges Facing Campuses
    Aaron Graves
    International Association of Campus Law
    Enforcement Administrators
    Chief of Police and Associate Vice President,
    Duke University

    Jeff McCracken
    President
    North Carolina Association of Campus Law En-
    forcement Administrators

Primer on Law Relating to Campus Safety
    Joy Strickland
    Assistant Attorney General for Law Enforcement
    North Carolina Department of Justice

    Tom Ziko
    Special Deputy Attorney General for Education
    North Carolina Department of Justice

Panel: What North Carolina Campuses Are Doing Now
    Scott Bullard
    Director for Emergency Services
    North Carolina Community College System

    Regina Lawson
    Chief of Police
    Wake Forest University Police Department

    David Rainer
    Associate Vice Chancellor for Environmental
    Health and Public Safety
    North Carolina State University

MEETING OF JULY 31, 2007

North Campus
Central Piedmont Community College
Huntersville, North Carolina

Presentation of Charge
    Attorney General Roy Cooper

Virginia Tech First Responder Perspective
    Kevin Foust
    FBI Supervisory Senior Resident Agent
    Roanoke, Virginia

Conducting a Threat Assessment in Light of ADA and FERPA
    Kemal Atkins
    University of North Carolina System

    Lucien "Skip" Capone
    University Counsel
    UNC-Greensboro

Conducting a Vulnerability Assessment
    William Lassiter
    Manager
    Center for Prevention of School Violence

    Mark Goodman
    Director
    Onslow County Emergency Management

    Sharon Boyd
    Emergency Operations Coordinator
    UNC-Wilmington

Critical Incident Management, Drills/Tabletops, and Communications During a Crisis
    Eric Tellefsen
    Special Agent
    State Bureau of Investigation

    Vincent Bud Cesena
    Director of School Law Enforcement
    Charlotte-Mecklenburg School District

    Bill Booth
    President
    Risk Management Associates

MEETING OF SEPTEMBER 11, 2007

University of North Carolina-Greensboro
Elliott University Center - Alexander Room
Greensboro, North Carolina

Panel: Tools for Responding to a Critical Incident
>   Captain Alan Melvin
>   Assistant Director, Support Services Section
>   North Carolina State Highway Patrol
>
>   Chet Jernigan
>   Deputy Director
>   North Carolina Justice Academy
>
>   Coy Poole
>   Instructor / Coordinator
>   North Carolina Justice Academy
>
>   Captain Paul Lester
>   Support Services Commander
>   UNC-Greensboro Police Department
>
>   Scott L. Bullard
>   Director for Emergency Services
>   North Carolina Community College System

Panel: Tools for Recovering from a Critical Incident
>   Sandra Wartski
>   Chair of the Disaster Committee
>   North Carolina Psychological Association
>
>   Tony Queen
>   Executive Director
>   North Carolina Victims Assistance Network
>
>   Dr. Maureen Hartford
>   President
>   Meredith College

Discussion of Report Issued by the Virginia Tech Review Panel
>   Attorney General Roy Cooper
>
>   Hollis Stambaugh
>   Director for the Center for Public Protection
>   TriData
>   Deputy Director
>   Virginia Tech Review Panel

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